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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

-----X  
Keith Raniere,

Plaintiff,

- v -

Case No. 4:22-cv-00561-RCC

Merrick Garland, et. al.,

Defendants.  
-----X

**MOTION TO REQUEST EXTENSION OF  
DEADLINE TO FILE RESPONSE IN OPPOSITION  
TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

1. Plaintiff Keith Raniere, through his undersigned counsel, hereby moves to request the Court for an order granting a reasonable extension of the deadline to submit a Response in Opposition to Defendants' Motion for Summary Judgment related to the above-captioned case, which is due on May 20, 2024, to June 21, 2024 or any date thereafter that the Court deems acceptable. The reason for the request is as follows:

2. In furtherance of our intention to have Mr. Raniere contribute to the composition of the response, if the filing of one is deemed to be necessary, Mr. Raniere's incarceration continues to pose logistical challenges to enable him to easily participate with our office in the drafting of his response.

3. Notwithstanding this, the Parties were actively engaging in discussion to resolve this matter. Although we may have reached an impasse as to a certain point, this extension is sought to afford additional time for the undersigned counsel to engage in consultation with Plaintiff regarding a possible settlement offer as well as the filing of his Response. Although this is the ninth request by the undersigned counsel on behalf of Plaintiff for an extension to file a Response in Opposition to Defendants' Motion for Summary Judgment, we feel it necessary considering the current circumstances. Therefore, the undersigned counsel respectfully requests the Court for a reasonable extension to file the Response.

4. We have conferred with counsel for the Defendants, and they do not oppose Plaintiff's request for an extension, and consent to the requested date of June 21, 2024.

5. Based on the foregoing, Plaintiff respectfully requests the date to file his Response in Opposition to Defendants' Motion for Summary Judgment be extended to June 21, 2024, or any date thereafter that the Court deems convenient.

Date: May 13, 2024

Respectfully submitted,

/s/ Arthur L. Aidala

Arthur L. Aidala, Esq.  
Attorney for Plaintiff

Delivered via ECF  
to all Registered Parties